State of Alabama

County of Covington

AFFIDAVIT

My name is John (Buck) Roberts and I reside at 2829 Easy Street Road in Florala, Alabama. I am familiar with the former Lockhart wood treatment facility because I was a millwright there for over 21 years. As a millwright I did repairs, welding and metal work and worked for all three of the operators, including TMA (PACTIV) and Louisiana-Pacific.

We built a pump system to pump wastewater from the containment ponds back to the boiler. We had a big spray head and cut a hole in the smokestack. We stood the spray head up inside the smokestack about six or eight feet over the smoke detector so that it would not be measured by the only detector in the boiler. We pumped the wastewater from our containment pond into these spray nozzles so that the water would evaporate and go up with the smoke.

Some of our scrap and waste wood treatment chemicals at the mill were buried, but most of the scrap and waste was burned in the boilers. We also had a method of putting steam into the wood treatment chemical holding tanks to boil the water out of the chemicals to a certain point. The

water would boil before the chemicals would out and the vapors would escape through manholes or vents in order to get the water that accumulated in the wood treatment chemicals such as creosote and pentachlorophenol out of the mixture. Water would accumulate from the steam and the green wood that was used to make treated lumber. We could not stack round poles on the carts used in the drying kiln without sides on them. So without sides we could not dry the round poles and we dried them in the treatment cylinders. All of the steam and waste water from the poles accumulated in the treatment chemicals and had to be removed. We had no other way of disposing of our scrap and waste, except to bury it or burn it.

JOHN (BUCK) ROBERTS

Sworn to and subscribed before me this 10 day of April, 2006.

NOTARY PUBLIC

My Commission Expires: 9-13-08

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